

United States District Court	DISTRICT of ARIZONA
United States of America v. Richard Allen Tinsley DOB: 1956; United States	DOCKET NO.
	MAGISTRATE'S CASE NO.
	18-08717MJ

Complaint for violation of Title 8 United States Code § 1324(a)(1)(A)(iii) & 1324(a)(1)(B)(i)

COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:

On or about July 14, 2018, at or near Douglas, in the District of Arizona, **Richard Allen Tinsley**, knowing or in reckless disregard that certain aliens, including Geronimo Miguel-Garcia, Carolina Miguel-Garcia, Maria Aguilar-Deleon, Tomas Negrete-Miron, and Luz Arellano-Gomez, had come to, entered, and remained in the United States in violation of law, did conceal, harbor, or shield said aliens within the United States in any place, including any building or any means of transportation, in furtherance of such violation of law and did so for the purpose of private financial gain; in violation of **Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i)**.

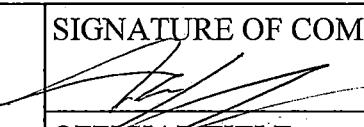
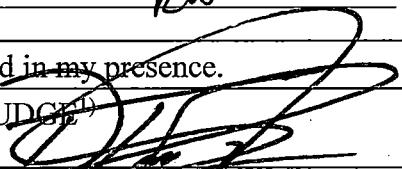
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

On or about July 14, 2018, at or near Douglas, in the District of Arizona, United States Border Patrol Agents (BPA) were conducting surveillance on a residence. Records checks of the home revealed that **Richard Allen Tinsley** was the owner of the home and has a history of smuggling illegal aliens. BPA approached the front door and engaged **Tinsley** in a consensual encounter. BPA heard yelling from the backyard and asked **Tinsley** for permission to enter the home. **Tinsley** gave permission and BPA found two subjects in the home and identified them as Carolina Miguel-Garcia and Tomas Negrete-Miron. BPA found five subjects in the backyard and identified them as Geronimo Miguel-Garcia, Maria Aguilar-Deleon, Luz Arellano-Gomez, and two juveniles. BPA determined that all seven subjects were in the United States illegally.

The material witnesses, Geronimo Miguel-Garcia, Tomas Negrete-Miron, and Luz Arellano-Gomez, stated that they had made arrangements to be smuggled into the United States in exchange for money. They identified **Tinsley** in a photo lineup as the caretaker of the home who was giving them food and water.

Carolina Miguel-Garcia and Maria Aguilar-Deleon either claimed they made no financial arrangements to enter the United States illegally, or did not specify their arrangements. They did not clearly identify **Tinsley** in a photo lineup as the caretaker of the house.

MATERIAL WITNESSES IN RELATION TO THE CHARGE: Geronimo Miguel-Garcia, Carolina Miguel-Garcia, Maria Aguilar-Deleon, Tomas Negrete-Miron, and Luz Arellano-Gomez

Detention Requested Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.	SIGNATURE OF COMPLAINANT 
AUTHORIZED BY: AUSA RW _____ <i>RW</i>	OFFICIAL TITLE Border Patrol Agent
Sworn to before me and subscribed in my presence.	
SIGNATURE OF MAGISTRATE JUDGE 	DATE July 16, 2018

1) See Federal rules of Criminal Procedure Rules 3 and 54